

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CINCINNATI DIVISION**

WILLIAM J. DEVORE III, et al.,

* **CASE NO.**

Plaintiffs,

Judge

v.

*

SHANNON W. ABRAM, et al.,

NOTICE OF REMOVAL

Defendants.

*

Defendants, Shannon W. Abram and Cellent Global Logistics, LLC (“Defendants”), by their attorney, file this notice of removal of Case No.: CV 2021 07 0916 from the Court of Common Pleas, Butler County, Ohio, to the United States District Court of the Southern District of Ohio, Cincinnati Division. In support, Defendant states as follows:

1. Plaintiff initiated this action by filing a complaint against Shannon Abram and Cellent on July 2, 2021, in the Court of Common Pleas, Butler County Ohio, Case No. CV 2021 07 0916, styled *William J. DeVore III, et al. v. Shannon W. Abram, et al.*, (hereinafter “state court action”). Shannon Abram was served via certified mail on or about July 19, 2021.
2. A copy of the complaint and summons is attached as Exhibit A.
3. The state court action is a controversy between citizens of different states, and the amount in controversy exceeds \$75,000.00.
 - a. William DeVore, Plaintiff, is a resident of Hamilton County, Ohio, and therefore for diversity purposes, he is a citizen of the State of Ohio.
 - b. Nancy DeVore, Plaintiff, is a resident of Hamilton County, Ohio, and therefore for diversity purposes, she is a citizen of the State of Ohio.
 - c. Shannon Abram is a resident of Macon, Georgia, and, therefore, for diversity purposes, he is a citizen of the State of Georgia.
 - d. Cellent is a limited liability corporation organizing and existing under the laws of the State of South Carolina, with its principal place of business in South

Carolina. Therefore, for diversity purposes, Cellent is a citizen of the State of South Carolina.

- e. This is a civil action brought in state court, over which the United States District Court has original jurisdiction because of both diversity of citizenship and an amount in controversy in excess of \$75,000.00, under 28 USC section 1332.
4. The state court action is one that may be removed to this Court, and this notice of removal is filed pursuant to 28 USC sections 1441 and 1446, within thirty days of service of the complaint upon Defendants.
5. A copy of this notice of removal will be served on Plaintiffs' attorney and a notice of filing of this notice of removal will be filed with the Court of Common Pleas, Butler County Ohio. A copy of that notice is attached as Exhibit B.

WHEREFORE, Defendants, Shannon Abram and Cellent Global Logistics, LLC, pray that Case No. CV 2021 07 0916 in the Court of Common Pleas, Butler County Ohio, be removed to and proceed in this Court, and that no further proceedings in this matter be had in the Court of Common Pleas, Butler County, Ohio.

Respectfully submitted,

GARVEY | SHEARER | NORDSTROM, PSC

/s/Jennifer K. Nordstrom

Jennifer K. Nordstrom (0066509)

2388 Grandview Drive

Ft. Mitchell, Kentucky 41017

Phone: (513) 445-3373

FAX: (866) 675-3676

jnordstrom@gsn-law.com

Attorney for Defendants, Cellent Global Logistics, LLC and Shannon Abram

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the above document was served by email on this 30th day of July, 2021, upon the following:

James Ferris, FERRIS & MANTER, 6124 Corbly Road, Cincinnati, Ohio 45230, Email:
Jameskf@ferrisandmanter.com, *Attorney for William DeVore III and Nancy DeVore*

John Doe, *Defendant*

/s/Jennifer K. Nordstrom

Jennifer K. Nordstrom